

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE COBALT INTERNATIONAL
ENERGY, INC. SECURITIES LITIGATION

Lead Case No. 4:14-cv-3428 (NFA)

**NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT WITH THE SPONSOR DEFENDANTS,
SPONSOR DESIGNEE DEFENDANTS, AND GOLDMAN SACHS & CO. LLC
AND FOR APPROVAL OF NOTICE TO THE SETTLEMENT CLASS**

PLEASE TAKE NOTICE that Lead Plaintiffs and Class Representatives GAMCO Global Gold, Natural Resources & Income Trust and GAMCO Natural Resources, Gold & Income Trust, through their undersigned counsel, together with additional plaintiffs and Class Representatives (i) St. Lucie County Fire District Firefighters' Pension Trust Fund, (ii) Fire and Police Retiree Health Care Fund, San Antonio, (iii) Sjunde AP-Fonden, and (iv) Universal Investment Gesellschaft m.b.H. hereby respectfully move the Court, pursuant to Federal Rule of Civil Procedure 23(e) for an Order (i) granting preliminary approval of the proposed class action settlement on the terms set forth in the Stipulation and Agreement of Settlement with the Sponsor Defendants, the Sponsor Designee Defendants and Goldman Sachs & Co. dated October 9, 2018, (ii) certifying the proposed Settlement Class for settlement purposes, (iii) approving the form and manner of notice of proposed settlement to the Settlement Class; and (iv) approving the schedule for various deadlines in connection with the settlement.

Submitted herewith in support of this Unopposed Motion for Preliminary Approval are: (i) the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement with the Sponsor Defendants, Sponsor Designee Defendants, and Goldman Sachs & Co. LLC and for Approval of Notice to the Settlement Class; and (ii) the Declaration of Andrew J. Entwistle in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement with the Sponsor Defendants, Sponsor Designee Defendants, and Goldman Sachs & Co. LLC and for Approval of Notice to the Settlement Class, attached the stipulation of settlement and supporting exhibits.

Dated: October 12, 2018

Respectfully submitted,

ENTWISTLE & CAPPUCCI LLP

By: /s/Andrew J. Entwistle

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CERTIFICATE OF SERVICE

I certify that on October 12 2018, the foregoing motion by Plaintiffs for preliminary approval of settlement and all supporting documents were filed with Clerk of the Court through the Court's ECF system, which will cause the document to be served upon all counsel of record.

/s/ Andrew J. Entwistle
Andrew J. Entwistle